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Fund For A Responsible Future Post Office Box 529 Washington, DC 20044-0529

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Thomas J. Bliley, Jr. Honorary Chairman

November 25, 1997

Andrew Dodson Federal Election Commission 999 E Street, NW Washington, DC 20463

Re: FEC Inquiry November 19, 1997

Identification Number: C00301887

Dear Mr. Dodson:

The Fund for a Responsible Future is operated essentially by volunteers and does not maintain an office; consequently, there are no administrative expenses for rent, utilities, salaries or supplies. The accounting services provided by Deloitte & Touche LLP are reflected as expenses paid for by the PAC and the fee includes any associated overhead (rent, utilities, etc.) incurred by the firm. As noted the mid-year report included fees for a period in excess of 60 days. D&T will be billing on a 60-day cycle; accordingly, the debt reporting provisions will not come into play.

Regards,

Janet Bain



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

NOV 19 1997

Janct Bain, Treasurer
Pund for a Responsible Future
P.O. Box 529
Washington, DC 20044

Identification Number:

C00301887

Reference:

Mid-Year Report (1/1/97-6/30/97)

Dear Ms. Bain:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows: \(\text{S}(\text{T}) \cdot \(\text{S}(\text{T}) \cdot \text{T}(\text{S}) \cdot \text{T}

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2:U.S.C. §§441a and 441b.

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Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Andrew J. Dodson

Senior Reports Analyst

Reports Analysis Division

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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PREPARER

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